

**REMARKS**

In the non-final Office Action, the Examiner rejects claims 1-8 and 19 under 35 U.S.C. § 102(e) as anticipated by MCKENNA et al. (U.S. Patent No. 5,684,967); rejects claims 9-18 and 20 under 35 U.S.C. § 103(a) as unpatentable over MCKENNA et al. in view of BARKER et al. (U.S. Publication No. 2001/0052006) or ALFIERI et al. (U.S. Patent No. 5,666,486). Applicants respectfully traverse these rejections.

By the present amendment, Applicants amend claims 8 and 10-16 to improve form. Claims 1-20 remain pending.

Claims 1-8 and 19 stand rejected under 35 U.S.C. § 102(e) as allegedly anticipated by MCKENNA et al. Applicants respectfully traverse this rejection.

Claim 1 is directed to a computer in a telecommunications network including a processor; and a resource management means for enabling the processor to provide standardized management of multiple resources including internal operational resources, external components, and applications processing data. The resource management means comprises one or more resource managers. The resource managers being one of a semaphore resource manager, a switch controller resource manager, an agent resource manager, a call data block resource manager, a service logic resource manager, or a switch resource resource manager. Each of the resource managers comprises one or more resource manager application program interfaces that manage the internal operational resources, the external components, and the applications processing data; and one or more data storing means for enabling the processor to store data in table format related to the internal operational resources, the external components, and the applications

processing data. The application interfaces manipulate the data to reflect the current resource state. MCKENNA et al. does not disclose or suggest this combination of features.

For example, MCKENNA et al. does not disclose or suggest a resource management means for enabling the processor to provide standardized management of multiple resources including internal operational resources, external components, and applications processing data. The Examiner relies on col. 3, lines 1-16, as allegedly disclosing a resource management means for enabling a processor to provide standardized management of multiple resources including internal operational resources and external components (Office Action, pg. 2). Applicants respectfully submit that the Examiner has mischaracterized the above feature of claim 1.

Claim 1 does not merely recite a resource management means for enabling a processor to provide standardized management of multiple resources including internal operational resources and external components. Instead, claim 1 specifically recites a resource management means for enabling a processor to provide standardized management of multiple resources including internal operational resources, external components, and applications processing data. The Examiner does not point to any section of MCKENNA et al. that discloses a resource management means for enabling the processor to provide standardized management of multiple resources including applications processing data, as required by claim 1. Accordingly, a proper case of anticipation has not been established with respect to claim 1.

Nevertheless, at col. 3, lines 1-16, MCKENNA et al. discloses:

The GTM is given information from an arbitrary number of independent discovery processes, hereinafter referred to as Topology Discovery Applications (TDAs) or Topology Agents running under the different networking protocols. The TDAs can be implemented as a component process in the network management platform.

FIG. 1 illustrates a typical environment for a complex, heterogeneous communications network in which the present invention is implemented. As shown by FIG. 1, many networks today are created by appending a plurality of smaller networks to each other. Each of these smaller networks can utilize a different protocol. The network depicted in FIG. 1 contains an SNA subnetwork 101, a token ring subnetwork 102, a TCP/IP subnetwork 103, an OSI subnetwork 104 and an ATM subnetwork 105. Each of these subnetworks contains its own topology agent 111-115.

This section of MCKENNA et al. discloses that the generalized topology manager (GTM) receives information from independent discovery processes, referred to as Topology Discovery Applications (TDAs) or Topology Agents. This section of MCKENNA et al. further discloses an environment containing a number of smaller networks 101-105. This section of MCKENNA et al. in no way discloses or suggests a resource management means for enabling a processor to provide standardized management of multiple resources including internal operational resources, external components, and applications processing data, as required by claim 1.

Moreover, neither this section of MCKENNA et al. nor any other section of MCKENNA et al. discloses a resource management means (which the Examiner appears to allege corresponds to MCKENNA et al.'s GTM) that enables a processor to provide standardized management of internal operational resources (which the Examiner alleges corresponds to the TDAs), external components (which the Examiner alleges corresponds to smaller networks 101-103), and application processing data. MCKENNA et al. appears to disclose the GTM receiving information from the TDAs, but MCKENNA et

al. does not disclose or suggest the GTM providing standardized management of the TDAs, smaller networks 101-103, and application processing data, as required by claim 1.

MCKENNA et al. does not further disclose or suggest a resource management means that includes one or more resource managers, where each resource manager includes one or more data storing means for enabling the processor to store data in table format related to the internal operational resources, the external components, and the applications processing data, as also required by claim 1. The Examiner relies on col. 3, lines 17-24, and col. 6, lines 35-57, of MCKENNA et al. for allegedly disclosing this feature (Office Action, pg. 3). Applicants respectfully disagree with the Examiner's interpretation of MCKENNA et al.

At col. 3, lines 17-24, MCKENNA et al. discloses:

Although each of these agents may have different information reported by the devices in its subnetwork, each agent will report a consistent set of information to the generalized topology manager 120. The topology information elements used in the preferred embodiment are defined and described in the tables shown in the Appendix. When information is sent from the TDA to the GTM, the GTM stores it in the appropriate tables 121-123.

This section of MCKENNA et al. discloses agents from subnetworks 101-105 reporting information to the GTM. This section of MCKENNA in no way discloses or suggests a resource management means that includes one or more resource managers, where each resource manager includes one or more data storing means for enabling the processor to store data in table format related to the internal operational resources, the external components, and the applications processing data, as required by claim 1.

At col. 6, lines 35-57, MCKENNA et al. discloses:

The operational state change signal is issued whenever a state variable for a row or row equivalent requires change to properly reflect the state of the resource being represented. It contains the unique index variable value previously assigned to the row representing the resource as well as the new state variable value. Such state variables include, but are not limited to, the following variables:

operationalState

unknownStatus

availabilityStatus

alarmState

State variable definitions are provided in Appendix Table 1.

#### Variable Value Change

The variable value change signal is issued whenever a non-state variable for a row or row equivalent requires change to properly reflect the current variable value for the resource being represented. It contains the unique index variable value previously assigned to the row representing the resource as well as the values of all variables which have changed.

This section of MCKENNA et al. discloses that an operational state change signal is issued to properly reflect a state of a resource. This section of MCKENNA et al. also discloses a variable value change signal that is issued to properly reflect a current variable value for a resource. This section of MCKENNA et al. does not disclose or suggest a resource management means that includes one or more resource managers, where each resource manager includes one or more data storing means for enabling the processor to store data in table format related to the internal operational resources, the external components, and the applications processing data, as required by claim 1.

For at least the foregoing reasons, Applicants submit that claim 1 is not

anticipated by MCKENNA et al.

Claims 4, 5, and 19 depend from claim 1. Therefore, Applicants submit that these claims are not anticipated by MCKENNA et al. for at least the reasons given above with respect to claim 1.

Independent claim 2 is directed to a method for managing resources within a network. The method includes sending a query to a resource manager, wherein the resource manager manages information corresponding to a resource, and where the resource manager complies with a common standard for resource managers within the network. The method further includes managing data stored in memory and organized in table format using the query, including manipulating the data to reflect the current resource state. The data is one of semaphore data, switch controller data, agent data, call data block data, service logic program data, or switch data. MCKENNA et al. does not disclose or suggest this combination of features.

For example, MCKENNA et al. does not disclose or suggest sending a query to a resource manager that complies with a common standard for resource managers within the network. The Examiner relies on col. 7, line 22, to col. 8, line 7, and col. 25, lines 1-3, of MCKENNA et al. for allegedly disclosing this feature (Office Action, pg. 3).

Applicants respectfully disagree with the Examiner's interpretation of MCKENNA et al.

At col. 7, line 22, to col. 8, line 7, MCKENNA et al. discloses:

There are various techniques for retrieving information maintained by a topology manager from the tables. Any one of these known methods can be used and in no way limit the scope of this invention.

The method of presenting the topology information in the present invention involves mapping the Topology Information Elements in Tables

121-123 to elements of a user interface which includes means to create and display windows and symbols. The Topology Information Elements of graph, arc, and simple connection are presented as windows. The Topology Information Elements of graph, members, member arcs, underlying arcs and underlying connections are presented as symbols on the windows. The algorithm for displaying the topology information contained in the GTM format is described below.

This section of MCKENNA et al. discloses methods for retrieving information maintained by a topology manager. This section of MCKENNA et al. in no way discloses or suggests sending a query to a resource manager that complies with a common standard for resource managers within the network, as required by claim 2. In fact, MCKENNA et al. appears to disclose a single resource manager (i.e., GTM 120). Thus, MCKENNA et al. cannot disclose or suggest sending a query to a resource manager that complies with a common standard for resource managers within the network, as required by claim 2.

At col. 25, lines 1-3, MCKENNA et al. discloses:

The above mentioned method of parsing through the information stored in the GTM tables 121-123 will result in displays such as that shown in FIG. 2.

This section of MCKENNA et al. in no way relates to sending a query to a resource manager that complies with a common standard for resource managers within the network, as required by claim 2.

If this rejection is maintained, Applicants respectfully request that the Examiner logically explain how the above sections of MCKENNA et al. can reasonably be interpreted to disclose sending a query to a resource manager that complies with a common standard for resource managers within the network, as required by claim 2.

For at least the foregoing reasons, Applicants submit that claim 2 is not anticipated by MCKENNA et al.

Claims 6 and 7 depend from claim 2. Therefore, these claims are not anticipated by MCKENNA et al. for at least the reasons given above with respect to claim 2.

Independent claim 3 is directed to a computer in a telecommunications network. The computer includes a processor and a plurality of application program interface means for enabling the processor, which is connected to a memory, to provide an interface between one or more resource requestors and data organized in a plurality of tables, where each of the plurality of tables corresponds to one of a plurality of resources. Each of the plurality of application program interface means includes sending means for sending a query, and managing means for managing data stored in the memory and organized in table format using the query, wherein the application program interface means provides system-wide interface with the data. Each of the plurality of application program interface means complies with a common standard for application program interfaces. Each of the plurality of application program interface means manipulates the data to reflect the current resource state. MCKENNA et al. does not disclose or suggest this combination of features.

For example, MCKENNA et al. does not disclose or suggest a plurality of application program interface means for enabling a processor, which is connected to a memory, to provide an interface between one or more resource requestors and data organized in a plurality of tables. The Examiner alleges that the tables of MCKENNA et al.'s GTM 120 correspond to the recited plurality of application program interface means



and points to col. 7, line 22, to col. 8, line 7, col. 25, lines 1-3, and col. 3, lines 17-35, of MCKENNA et al. for support (Office Action, pg. 4). Applicants respectfully disagree with the Examiner's interpretation of MCKENNA et al.

At the outset, Applicants submit that one skilled in the art at the time of Applicants' invention would not reasonably construe the group of tables in MCKENNA et al.'s GTM 120 as corresponding to a plurality of application program interface means for enabling a processor, which is connected to a memory, to provide an interface between one or more resource requestors and data organized in a plurality of tables, as required by claim 3. If this rejection is maintained, Applicants respectfully request that the Examiner logically explain how a group of tables could be construed as application program interfaces, as "application program interface" is known in the art.

Col. 7, line 22, to col. 8, line 7, of MCKENNA et al. is reproduced above. This section of MCKENNA et al. discloses methods for retrieving information maintained by a topology manager. This section of MCKENNA et al. in no way discloses or suggests the tables stored in GTM 120 enabling a processor, which is connected to a memory, to provide an interface between one or more resource requestors and data organized in a plurality of tables, as would be required by the Examiner's interpretation of claim 3.

Col. 25, lines 1-3, of MCKENNA et al. discloses parsing information stored in the tables of GTM 120. This section of MCKENNA et al. in no way discloses or suggests the tables stored in GTM 120 enabling a processor, which is connected to a memory, to provide an interface between one or more resource requestors and data organized in a plurality of tables, as would be required by the Examiner's interpretation of claim 3.

At col. 3, lines 17-35, MCKENNA et al. discloses:

Although each of these agents may have different information reported by the devices in its subnetwork, each agent will report a consistent set of information to the generalized topology manager 120. The topology information elements used in the preferred embodiment are defined and described in the tables shown in the Appendix. When information is sent from the TDA to the GTM, the GTM stores it in the appropriate tables 121-123.

The tables 121-123, are created based on the topology information elements described in the Appendix, and derive principal value from a concise method of encoding topologically significant data using a collection of record structures having a tabular format. The Topology Information Elements are organized into three categories--Data elements 121, Relationship elements 122, and Auxiliary elements 123. Each of these elements are described below and are more fully described in a corresponding table in the Appendix.

This section of MCKENNA et al. discloses that tables 121-123 within GTM 120 are created based on topology information received from TDAs. This section of MCKENNA et al. in no way discloses or suggests tables 121-123 enabling a processor, which is connected to a memory, to provide an interface between one or more resource requestors and data organized in a plurality of tables, as would be required by the Examiner's interpretation of claim 3.

If this rejection is maintained, Applicants respectfully request that the Examiner logically explain how the above sections of MCKENNA et al. can reasonably be construed as disclosing tables 121-123 enabling a processor, which is connected to a memory, to provide an interface between one or more resource requestors and data organized in a plurality of tables, as would be required by the Examiner's interpretation of claim 3.

For at least the foregoing reasons, Applicants respectfully submit that claim 3 is

not anticipated by MCKENNA et al.

Claim 8 depends from claim 3. Therefore, this claim is not anticipated by MCKENNA et al. for at least the reasons given above with respect to claim 3.

Claims 9-18 and 20 stand rejected under 35 U.S.C. § 103(a) as allegedly unpatentable over MCKENNA et al. in view of BARKER et al. Applicants respectfully traverse this rejection.

Claims 9-18 depend from claim 3. The disclosure of BARKER et al. does not remedy the deficiencies in the disclosure of MCKENNA et al. set forth above with respect to claim 3. Therefore, claims 9-18 are patentable over MCKENNA et al. and BARKER et al., whether taken alone or in any reasonable combination, for at least the reasons given above with respect to claim 3.

Claim 20 depends from claim 1. The disclosure of BARKER et al. does not remedy the deficiencies in the disclosure of MCKENNA et al. set forth above with respect to claim 1. Therefore, claim 20 is patentable over MCKENNA et al. and BARKER et al., whether taken alone or in any reasonable combination, for at least the reasons given above with respect to claim 1.

Claims 9-18 and 20 stand rejected under 35 U.S.C. § 103(a) as allegedly unpatentable over MCKENNA et al. in view of ALFIERI et al. Applicants respectfully traverse this rejection.

Claims 9-18 depend from claim 3. The disclosure of ALFIERI et al. does not remedy the deficiencies in the disclosure of MCKENNA et al. set forth above with respect to claim 3. Therefore, claims 9-18 are patentable over MCKENNA et al. and

ALFIERI et al., whether taken alone or in any reasonable combination, for at least the reasons given above with respect to claim 3.

Claim 20 depends from claim 1. The disclosure of ALFIERI et al. does not remedy the deficiencies in the disclosure of MCKENNA et al. set forth above with respect to claim 1. Therefore, claim 20 is patentable over MCKENNA et al. and ALFIERI et al., whether taken alone or in any reasonable combination, for at least the reasons given above with respect to claim 1.

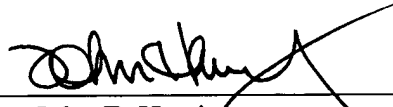
In view of the foregoing amendments and remarks, Applicants respectfully request the Examiner's reconsideration of this application, and the timely allowance of the pending claims.

To the extent necessary, a petition for an extension of time under 37 C.F.R. § 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account No. 07-2347 and please credit any excess fees to such deposit account.

Respectfully submitted,

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Date: March 16, 2006

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